

Form <b>668-A(ICS)</b> (April 2020)	Department of the Treasury – Internal Revenue Service <b>Notice of Levy</b> <b>A21-26471</b>		
Date <b>09/09/2021</b> Reply to <b>Internal Revenue Service</b> <b>V C SANDLES</b> <b>5450 STRATUM DR STE 150</b> <b>FORT WORTH, TX 76137</b>	Telephone number of IRS office <b>(817)232-6316</b>  Name and address of taxpayer <b>ROBERT T BROCKMAN</b> <b>333 W. FRIAR TUCK LANE</b> <b>HOUSTON, TX 77024-5741337</b>		
To <b>AMERGY BANK NA</b> <b>%ZION BANKCORP</b> <b>1875 SOUTH REDWOOD RD</b> <b>SALT LAKE CITY, UT 84104</b>	Identifying number(s) <span style="background-color: black; color: black;">XXXXXXXXXX</span>		
Special instructions for certain property levied			

**This isn't a bill for taxes you owe. This is a notice of levy we are using to collect money owed by the taxpayer named above.**

Kind of Tax	Tax Period Ended	Unpaid Balance of Assessment	Statutory Additions	Total
1040	12/31/2004	\$82,512,479.00	\$219,714,556.55	\$302,227,035.55
1040	12/31/2005	\$32,772,341.00	\$79,667,968.09	\$112,440,309.09
1040	12/31/2006	\$38,916,900.00	\$84,597,374.31	\$123,514,274.31
1040	12/31/2007	\$2,547,543.00	\$4,939,814.38	\$7,487,357.38
1040	12/31/2010	\$110,120,720.00	\$173,641,891.22	\$283,762,611.22
1040	12/31/2012	\$21,712,495.00	\$30,397,065.33	\$52,109,560.33
1040	12/31/2013	\$36,939,855.00	\$49,095,026.48	\$86,034,881.48
1040	12/31/2014	\$14,156,595.00	\$17,840,451.09	\$31,997,046.09
1040	12/31/2015	\$53,460,628.00	\$63,500,040.21	\$116,960,668.21
<b>Total Amount Due</b>				See page 2

We figured the interest and late payment penalty to 09/09/2021

The Internal Revenue Code provides that there is a lien for the amount that is owed. Although we have given the notice and demand required by the Code, the amount owed hasn't been paid. This levy requires you to turn over to us this person's property and rights to property (such as money, credits, and bank deposits) that you have or which you are already obligated to pay this person. However, don't send us more than the "Total Amount Due."

Money in banks, credit unions, savings and loans, and similar institutions described in section 408(n) of the Internal Revenue Code must be held for 21 calendar days from the day you receive this levy before you send us the money. Include any interest the person earns during the 21 days. Turn over any other money, property, credits, etc. that you have or are already obligated to pay the taxpayer, when you would have paid it if this person asked for payment. This levy does not attach to funds in IRAs, Self-Employed Individuals' Retirement Plans, or any other retirement plans in your possession or control.

Make a reasonable effort to identify all property and rights to property belonging to this person. At a minimum, search your records using the taxpayer's name, address, and identifying number(s) shown on this form. Don't offset money this person owes you without contacting us at the telephone number shown above for instructions. You may not subtract a processing fee from the amount you send us.

**To respond to this levy —**

1. Make your check or money order payable to **United States Treasury**
2. Write the taxpayer's name, identifying number(s), kind of tax and tax period shown on this form, and "LEVY PROCEEDS" on your check or money order (not on a detachable stub).
3. Complete the back of Part 3 of this form and mail it to us with your payment in the enclosed envelope.
4. Keep Part 1 of this form for your records and give the taxpayer Part 2 within 2 days.

If you don't owe any money to the taxpayer, please complete the back of Part 3, and mail that part back to us in the enclosed envelope.

Signature of Service Representative

**/S/ V C SANDLES**

Title

**REVENUE OFFICER**

Catalog Number 20435N

[www.irs.gov](http://www.irs.gov)

Form **668-A** (Rev. 4-2020)

**Part 3 – Complete and return to IRS**

**GOVERNMENT  
EXHIBIT**

22-cv-00202

No. 51

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Kind of Tax	Tax Period Ended	Unpaid Balance of Assessment	Statutory Additions	Total
1040	12/31/2016	\$23,918,714.00	\$26,361,429.49	\$50,280,143.49
1040	12/31/2017	\$108,161,287.00	\$109,740,197.52	\$217,901,484.52
1040	12/31/2018	\$17,576,763.00	\$15,980,237.04	\$33,557,000.04
<b>Total Amount Due</b>				<b>\$1,418,272,371.71</b>

We figured the interest and late payment penalty to **09/09/2021**

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Signature of Service Representative <b>/S/ V C SANDLES</b>	Title <b>REVENUE OFFICER</b>
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Form **668-A(ICS)**  
(April 2020)

Department of the Treasury – Internal Revenue Service

**Notice of Levy** A21-26471**Please Remove This Page Before Completing It****Section 1 – Levy Acknowledgment**

Signature of person responding



Printed name of person responding

Christina Heggstad- Legal Specialist

Your telephone number

800-601-9582

Date and time this levy received

09/14/21

**Section 2 – Levy Results** (Check all applicable boxes.)☐

Check attached in the amount of \$ \_\_\_\_\_

☐

No funds

**ACCOUNTS CLOSED**☒

No account

**NO ACCOUNTS**☐

No record

☒Account closed on 05/25/2021**Section 3 — Other Information** (please complete this section only if you are NOT sending us the total amount the taxpayer owes.)

Taxpayer's latest address, if different from the one on this levy

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Taxpayer's telephone number: (\_\_\_\_\_) \_\_\_\_\_ Next date you will owe funds to the taxpayer \_\_\_\_\_

Name and address of taxpayer's employer, if different from addressee

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Other information you believe may help us